



Eric Gonzalez
District Attorney

DISTRICT ATTORNEY
KINGS COUNTY
350 JAY STREET
BROOKLYN, NY 11201-2908
(718) 250-2000
WWW.BROOKLYNDA.ORG

[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: TAIMUR RAJA

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

ON NOVEMBER 3, 2015, MOS TAIMUR RAJA, SHIELD NUMBER 19639, WAS ARRAIGNED ON A CRIMINAL COURT COMPLAINT (KINGS COUNTY DOCKET NUMBER 2015KN071907), CHARGING HIM WITH TWO COUNTS OF OPERATING A MOTOR VEHICLE WHILE UNDER THE INFLUENCE OF DRUGS OR ALCOHOL (VTL §§ 1192(1) AND 1192(3)). THE CHARGES ARE BASED ON THE FOLLOWING ALLEGATIONS OF FACT: ON NOVEMBER 3, 2015, AT ABOUT 3:07 A.M., ON THE BROOKLYN QUEENS EXPRESSWAY AT KENT AVENUE IN BROOKLYN, POLICE OBSERVED MOS RAJA, WHILE OFF DUTY, BEING TREATED BY EMS PERSONNEL AT THE SCENE OF A MOTOR VEHICLE ACCIDENT INVOLVING A FORD MUSTANG CAR, WHICH APPEARED TO HAVE EXTENSIVE AUTOBODY DAMAGE. A WITNESS INFORMED THE POLICE THAT MOS RAJA HAD BEEN DRIVING THE FORD MUSTANG, HAD STRUCK THE WITNESS' TOYOTA CAR (WHICH SHOWED NO VISIBLE SIGN OF DAMAGE), AND HAD THEN HIT THE CEMENT ROAD BARRIER DIVIDER. ACCORDING TO POLICE AT THE SCENE, MOS RAJA EXHIBITED SIGNS OF INTOXICATION - NAMELY, RED WATERY EYES, A STRONG ODOR OF ALCOHOL ON HIS BREATH AND PERSON, AND UNSTEADY BALANCE.

ON FEBRUARY 5, 2016, MOS RAJA PLEADED GUILTY TO ONE COUNT OF DRIVING WHILE ABILITY IMPAIRED (VTL 1192[1]) AND WAS SENTENCED TO A CONDITIONAL DISCHARGE AND A \$300 FINE.

Disclosure # 2:

MOS RAJA PLED GUILTY TO THE FOLLOWING NYPD CHARGES AND SPECIFICATIONS DATED ON OR ABOUT NOVEMBER 3, 2015, WHILE THE MOS WAS ASSIGNED TO THE 70TH PRECINCT AND OFF-DUTY:
ALLEGATIONS:

1. MOS RAJA ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT IN THAT MOS RAJA WRONGFULLY OPERATED A MOTOR VEHICLE WHILE UNDER THE INFLUENCE OF AN INTOXICANT.
2. MOS RAJA ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT IN THAT MOS RAJA WRONGFULLY OPERATED A MOTOR VEHICLE WHILE HIS ABILITY WAS IMPAIRED BY THE CONSUMPTION OF ALCOHOL.

3. MOS RAJA ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT IN THAT MOS RAJA REFUSED TO SUBMIT TO A BREATHALYZER.

4. MOS RAJA DID CONSUME AN INTOXICANT TO THE EXTENT THAT THE MOS WAS UNFIT FOR DUTY.

CASE STATUS: CLOSED ON 08/10/2016

ACTION TAKEN: ORDERED BREATH TESTING, COUNSELING AS DETERMINED BY THE DEPARTMENT, TWELVE (12) MONTHS OF DISMISSAL PROBATION, THIRTY-FOUR (34) DAYS PRE-TRIAL SUSPENSION AND FORFEITURE OF SIX (6) VACATION DAYS.

Disclosure # 3: (PENDING)

THE FOLLOWING NYPD DEPARTMENTAL ALLEGATIONS, DATED 11/04/2020, ARE PENDING AGAINST MOS RAJA:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CASE STATUS: PENDING

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez
District Attorney
Kings County